

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI-DADE DIVISION**

ZAGG INC,

Case No.: 1:23-cv-20304-ALTMAN/REID

Plaintiff,

v.

MENACHEM MENDEL ICHILEVICI;
TX TRADING INC.;
DVG TRADE LLC; and

Defendants.

_____ /
DVG TRADE LLC,

Counterclaim-Plaintiff,

v.

ZAGG INC., SCREENYA, LLC,
MERRIL LONGMORE, and
BRENDAN BUCKNER,

Counterclaim-Defendants.

_____ /

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY BRIEFS IN
SUPPORT OF *DAUBERT* MOTIONS AND MOTIONS FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. P. 6, ZAGG Inc., Screenya, LLC, Merrill Longmore, and Brendan Buckner (collectively, “the ZAGG Parties”), jointly with Defendant/Counterclaimant DVG Trade LLC, Defendant Menachem Mendel Ichilevici, and Defendant TX Trading Inc. (collectively, “Defendants”), respectfully submit this request for an extension of time for the parties to file their replies in support of their respective *Daubert* motions (ECF Nos. 305 & 309) and motions for summary judgment (ECF Nos. 308 & 317). In support of this Motion, the Parties state:

1. On December 23, 2025, the Court issued a Second Amended Scheduling Order, setting April 11, 2025 as the deadline for all pre-trial motions, including motions for summary judgment and *Daubert* motions. (ECF No. 277.)

2. On March 20, 2025, the Court issued an Order Following Hearing, in which it set the deadline for “[r]esponses to the motions for summary judgment” as May 9, 2025, and “[r]eplies to the responses” as May 16, 2025. (ECF No. 293, ¶ 293.)

3. On April 24, 2024, the Court issued an Order setting the deadline for “responses to the pending *Daubert* motions” as May 9, 2025, and “replies to these responses” as May 16, 2025. (ECF No. 319.)

4. Due to time constraints caused by commitments in other matters, the Parties respectfully request a one-week extension to the deadline for the parties’ replies in support of their respective motions for summary judgment and *Daubert* motions, such that those replies would be due on May 23, 2025.

5. This motion is timely made pursuant to Fed. R. Civ. P. 6 and in keeping with the Court’s procedures requiring filing requests for extensions of time. The parties are aware of the full caseload of the Southern District judges. Accordingly, the motion is not made for any purpose of delay. Rather, the motion is made to conserve judicial and party resources.

6. In accordance with Local Rule 7.1, the undersigned certifies that counsel for Defendants has conferred with counsel for Plaintiffs and is authorized to represent to the Court that Plaintiffs jointly move for the relief sought in the Motion.

WHEREFORE, the Parties respectfully request that the Court grant an extension of time up to and including May 23, 2025 for the Parties to file their respective replies in support of their respective *Daubert* motions and motions for summary judgment.

DATED: May 13, 2025

/s/ Mallory M. Cooney

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CERTIFICATE OF SERVICE

HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel or parties of record on this 13th day of May 2025.

By: /s/ Geoffrey M. Cahen